

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA,)
)
)
 vs.) Case No. 1:10-cr-00485-LMB
)
)
JEFFREY ALEXANDER STERLING,)
)
)
 Defendant.)
)
)

CONSENT MOTION FOR RETURN OF UNITED STATES PASSPORT

COMES NOW Jeffrey A. Sterling, by counsel, and for his Consent Motion for the Return of his United States Passport, states as follows:

1. In December of 2010, Mr. Sterling was indicted in this case. After his arraignment, Mr. Sterling was released pending trial. As part of the terms of his pre-trial release, Mr. Sterling was ordered to provide his United States Passport to Pretrial Services. (Docket Entry 22, January 25, 2011)
2. Mr. Sterling complied with all terms of his pretrial release including but not limited to surrendering his United States Passport to Pretrial Services.
3. On May 11, 2015 Mr. Sterling was sentenced by this Honorable Court and voluntarily surrendered to serve his sentence. (Docket Entry No. 473) Once he reported to BOP custody, the terms of his pretrial release became moot. Mr. Sterling has now been released from BOP custody and is residing in Saint Louis, Missouri where he is, consistent with the Court's sentence, subject to two years of supervised release.

4. Mr. Sterling's United States Passport, now expired, is still being held by Pretrial Services in Alexandria, Virginia.

5. Mr. Sterling has requested that his United States Passport be returned to him so that he can apply for a new United States Passport. Ms. Kimberly Hess, with the Probation Office in Alexandria, has told Mr. Sterling that she requires a court order from this Honorable Court in order to return the United States Passport.

6. Counsel for Mr. Sterling also contacted Mr. Trump who stated that so long as neither Pretrial Services nor the Probation Office currently supervising Mr. Sterling has any objection to this request, the United States consents to the relief requested.

7. On July 13, 2018, Ms. Hess advised counsel that she had contacted the Probation Office in Saint Louis, Missouri and that office also has no objection to this request.

WHEREFORE, Mr. Sterling requests that the instant motion be granted, and that Pretrial Services be ordered to return the expired United States Passport to Mr. Sterling. A proposed order is attached.

JEFFREY A. STERLING
By Counsel

By: _____/S/
Edward B. MacMahon, Jr.
VSB No. 25432
Edward B. MacMahon, Jr., PLC
P.O. Box 25
107 East Washington Street
Middleburg, VA 20118
(540) 687-3902
(540) 687-6366
ebmjr@macmahon-law.com
Counsel for Jeffrey Sterling

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

By: _____/S/_____
Edward B. MacMahon, Jr. (VSB # 25432)
Edward B. MacMahon, Jr., PLC
107 East Washington Street
P.O. Box 25
Middleburg, VA 20118
(540) 687-3902
(540) 687-6366 (facsimile)
ebmjr@macmahon-law.com
Counsel for Jeffrey A. Sterling